REMARKS

Claims 1-26 are pending in the present application. Of these claims, 1-17 and 23-26 stand rejected. The Applicants respectfully traverse the rejections of the claims as will be detailed below. The Applicants thank the Examiner for indicating that claims 18-22 are allowed.

By this amendment, claims 1-3, 5, 6, 10-13, 15, 16, 21, and 23-24 have been amended. Support for some of the claim amendments is discussed below in the discussion of the § 112, second paragraph rejections. Additionally, the specification has been amended to ensure that various sections in the specification explicitly comport with the language in the amended claims and also to ensure correspondence between the disclosed equations and the accompanying text describing the equations. Accordingly, no new matter is believed to be added by these amendments.

The Applicants wish to thank the Examiner for granting a telephone interview conducted with Applicants representative on March 2, 2005. During the interview, the independent claims rejected under 35 U.S.C. §112, second paragraph were discussed. The Examiner indicated that the proposed amendments to the claims, which are reflected in the present amendments, were sufficient to overcome the rejections under §112, second paragraph. Additionally, claims 1 and 23, which were rejected under 35 U.S.C. §101, were discussed. The Examiner indicated that if the word "computerized" were added before the word "method" in the preambles of these claims, the §101 rejections could be overcome. Although the Applicants are appreciative of the Examiner's suggestion, these amendments are not believed to be necessary to overcome the §101 rejection and the claims, as originally presented, are believed to be already meet the requirements of §101 as will be discussed below.

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Claims 11, 15, and 21 were objected to due to noted informalities concerning claimed dependencies. The amendments to these claims are believed to address and resolve these objections.

Claims 1-17 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite. In particular, independent claims 1 and 10 due to the inclusion of "a pixel value" in two instances. The amendments to these claims are believed to obviate this rejection. In particular, it is noted that the second instance of the claimed "a pixel value" has been amended to read "an interpolated pixel parameter value." Support for this amendment may be found, for example, in paragraph 17, which discusses that based on various vertex parameters, a particular pixel parameter is calculated. Further support for this amendment may also be found in paragraph 0032, which discusses that the disclosed method of FIG. 2, as an example, improves over known interpolating pixel parameter techniques. Moreover, paragraph 0031 of the present specification clearly indicates that the method repeats for each pixel value until all pixel parameters are calculated. Accordingly, no new matter is believed to be added by this amendment.

Claims 3, 5, 12 and 13 have also been amended in a similar fashion to comport with the amendments to independent claims 1 and 10. Accordingly, the rejections of claims 1-17 under 35 U.S.C. § 112, second paragraph, are believed to be resolved and withdrawal of this amendment is respectfully requested.

Claims 1 and 23 were rejected under 35 U.S.C. §101 as allegedly lacking patentable utility and/or useful process. The Office Action states that "the claimed invention fails to carry out any interpolation process" and that "the claimed invention only carries out the generation of numbers (i.e., pixel values, geometric values, or differential values)." The rejection concludes

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that "the disclosed invention is inoperative and therefore lacks utility." The Applicants respectfully disagree for the following reasons.

First, the Applicants submit that, contrary to the assertions in the Office Action, the claimed features of claims 1 and 23 indeed effect an interpolation process. Although the Office Action asserts that the claimed invention only carries out the generation of numbers, interpolation is by definition a calculation process. The claimed methods in claims 1 and 23 actually claim the determination of a value for each of a plurality of pixels based on a vertex parameter value, a first geomctric value and a second geometric value, this value being an interpolated pixel parameter value. Determination of this value was also, for example, discussed in paragraphs 28-31 of the present application. Accordingly, the assertion that disclosed invention is inoperative and lacks utility as a result is believed to be incorrect and this rejection should be withdrawn.

Applicants further note that §2107.01, paragraph II provides directive on examination of inventions that are allegedly "inoperative." This section indicates that such situations where an invention is found to be inoperative and lacking utility are rare. Thus, the Patent Office is cautioned in this section to judicially apply this particular type of §101 rejection to only those cases where the claimed device must be totally incapable of achieving a useful result. This is simply not the case in the present application. Quite the opposite, the claimed methods indeed achieve the useful result of interpolating pixel parameters, which, for example, improve interpolating pixel parameter techniques by utilizing terms calculated during a set up mode during a calculation mode affording fewer computations and improved precision with a corresponding improvement of processing speed and reduced overhead processing requirements

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over known prior parameter interpolation pixel techniques. Accordingly, the Applicants further submit that the rejection under § 101 is inappropriate and should be withdrawn.

Finally, in response to the Examiner's suggestion during the telephone interview that the word "computerized" be added to claims 1 and 23, the Applicants believe that the addition of this term would is unnecessary for patentability of these claims under §101. In particular, Applicants presume that the Examiner suggested this addition based on a conclusion that these method claims need to be differentiated from a process of mental steps. However, language in both of these claims would belie such a conclusion. Specifically, claim 1 includes "a setup mode" and "a calculation mode." These claimed elements indicate that claim 1 is differentiated from a series of mental steps. Additionally, claim 23 includes writing and reading values to and from a temporary buffer. Accordingly, the claimed methods of claims 1 and 23 are already differentiated from a method that could be characterized as a performable as a series of mental steps.

The Office Action indicates that claims 2-17 would be allowable if rewritten or amended to overcome the rejections under 35 U.S.C. §112, second paragraph. However, with respect to claims 2-9, it is unclear how these claims can be considered allowable when independent claim 1 from which these claims depend was rejected lacking patentable utility. Nonetheless, with respect to claims 10-17, these claims are believed to now be allowable due to the resolution of the 112 rejections.

Claims 18-22 were indicated as allowed. As the objection to claim 21 has been resolved, the Applicants submit that all of these claims are now allowable.

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In light of the foregoing comments, the Applicants respectfully request reconsideration and withdrawal of the present rejections and that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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